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ABSTRACT

Administrators at local, state, and national levels must be strongly committed to equal opportunity in vocational education. State administrators must fulfill mandates of Title II of the Education Amendments of 1976, including identifying major thrusts and challenges issued by Congress, identifying responsibilities of a state board/agency for administering vocational education and providing a state staff for this board. Barriers to equitable job training and placement are institutional, personal, societal, and programmatic. Techniques available to state directors of vocational staffs for providing ready access to vocational training or retraining are greater involvement of agencies and individuals in process of state planning, emphasis on nondiscriminatory practices, sole state agency concept for governance, and renewed efforts in accountability and evaluation. The state director of vocational education and state vocational staff can ensure equity in vocational education programs through a separate state board, a state plan, positive approach to evaluation, linkages, equal employment opportunity and personnel procedures, and combined staff efforts. State agencies should locate and make available positive strategies to vocational administrators, research quality of service from various vocational education structures, and research strategies that increase utilization of equal opportunities for vocational education and job placement. (YLB)

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Research and Development Series No. 214G

EQUITY FROM A STATE ADMINISTRATOR'S PERSPECTIVE

by Geneva Fletcher

THE NATIONAL CENTER FOR RESEARCH IN VOCATIONAL EDUCATION

SUMMARY Vocational educators have grappled with equity as a problem and have espoused it as a cause since 1963 when Congress issued both an equity mandate and an equity challenge with the passage of the Vocational Education Act. This paper is one of seventeen reports commissioned by the National Center for Research in Vocational Education to meet the equity challenge through a multidisciplinary approach encompassing three perspectives—academic, vocational education, and special interest group advocacy.

The following paper discusses the legislative requirements of Title II of the Education Amendments of 1976 and the responsiblities of state directors of vocational education for achieving equity. The author believes that legislation, if properly implemented within each state, is a tool for achieving equity. The funding provisions of the Education Amendments of 1976 are analyzed for their potential to contribute significantly to equity. The paper also outlines how to incorporate equity in state planning and how to establish procedures and practices. Governance, accountability, and evaluation provisions of the legislation are discussed. The author makes many suggestions for implementing Title II and discusses institutional, personal, societal, and programmatic barriers.

Are states making the necessary thrusts in the area of equity to meet the challenges that were presented with the passage of Public Law 94-482? Are states making changes and preparing to meet the challenges of the 80s? What equity goals have not yet been accomplished? Who should be responsible for carrying out activities related to these goals? How will the activities be funded? When will the equity goals be met? These are only a few of the many current concerns facing vocational educators at the local, state, and national levels.

Commitment to equal opportunity must be unmistakably clear at the top levels of administration if vocational educators are to meet the challenge of providing equal access to and meaningful participation in all vocational education programs. Only through strong leadership by

top administrators at the local, state, and national levels, can positive support be extended to others in vocational education who have the responsibility for creating a climate for equity in their respective areas.

In order for vocational educators to answer these questions and fulfill their commitment to equal opportunity, the following stipulations, implicit in Public Law 94-482, must be met: (1) identification of the major thrusts and challenges issued by Congress, (2) identification of the responsibilities of a state board or agency designated as the sole state agency responsible for the administration of vocational education in accordance with this law, and (3) the provision for a state staff, including a full-time state director, to enable the state board to carry out its function under the state plan for vocational education. Only when these initial steps have been made can vocational educators begin to implement these federal statutes.

ABOUT THE AUTHOR

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Implementation of Federal Statutes

Many major thrusts and challenges were issued to educators and more specifically to vocational educators with the passage of the Education Amendments of 1976. Title II, Education Amendments of 1976, Public Law 94-482 (Act) extends and revises the Vocational Education Act of 1963. The purpose of Title II, Part A, as stated in section 101 of the Act, the "Declaration of Purpose," is to assist states in improving planning in the use of all resources available to the states for vocational education and manpower training by involving a wide range of agencies and individuals concerned with education and training within the state in the development of the vocational education plans.

It is also the purpose of this part of the Act to authorize federal grants to states to assist them—

(1) to extend, improve, and where necessary, maintain existing programs of vocational education,

(2) to develop new programs of vocational education,

(3) to develop and carry out such programs of vocational education within each state so as to overcome sex discrimination and sex stereotyping in vocational education programs (including programs of homemaking), and thereby furnish equal educational opportunities in vocational education to persons of both sexes, and

(4) to provide part-time employment for youths who need the earnings from such employment to continue their vocational training on a full-time basis.

It is only when these mandates are fulfilled that persons of all ages in all communities of the state, those in high school, those who have completed or discontinued their formal education and are preparing to enter the labor market, those who have already entered the labor market but need to upgrade their skills or learn new ones, those with special educational handicaps, and those in postsecondary schools, will have ready access to vocational training or retraining that is of high quality, realistic in light of actual or anticipated opportunities for gainful employment, and that is suited to their needs, interests, and ability to benefit from such training.

Section 104 of the Act, "State Administration," states that any state desiring to participate in the programs authorized by this Act shall, consistent with state law, designate or establish a state board or agency which shall be the sole state agency responsible for the administration, or for the supervision of the administration, of such programs.

The responsibilities of the state board include, but are not limited to:

(a) Coordination of the development of policy with respect to such programs.

(b) Coordination of the development, and the actual submission to the Commissioner, of the five-year state plan required by section 107 and of the annual program plan and accountability report required by section 108.

(c) Consultation with the State Advisory Council on Vocational Education and other appropriate state agencies, councils, and individuals involved in the planning and reporting as required by sections 107 and 108.

Except with respect to those functions set forth in the preceding sentence, and with respect to the board's responsibility of cooperating with the administrator of the National Center for Educational Statistics as outlined in section 161 of the Act and section 104.32 of the Final Regulations, the state board may delegate any of its other responsibilities involving administration, operation, or supervision, in whole or in part, to one or more appropriate agencies.

The Final Regulations for Public Law 94-482, section 104.34 implement section 104(a)(1) and section 106(a)(1) of the Act. Section 104.34 of the Regulations states that the state board shall provide for a state staff sufficiently qualified by education and experience and in sufficient numbers to enable the state board to carry out its functions under the state plan. The state board staff shall include a full-time state director.

As deputy state director of vocational education, Indiana State Board of Vocational and Technical Education (state board), it is my responsibility to assist the state board and the executive officer/state director of vocational education in administering the state's program of vocational education in accordance with Title II, Education Amendments of 1976, Public Law 94-482 and in accordance with State Law—Indiana Acts of 1975, Public Law 227. All phases of the state's vocational

education program must meet state and federal statutes and regulations including provisions of the Five-Year State Plan and the Annual Program Plan for Vocational Education.

In addition to Title II, Education Amendments of 1976, a variety of laws, regulations, and policy statements affect vocational education including the Equal Pay Act of 1963, as amended by the Education Amendments of 1972; Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972; Title IX of the Education Amendments of 1972; sections 503 and 504 of the Rehabilitation Act of 1973 (effective date of Regulations, 1977); Executive Order 11246 of 1965, as amended by Executive Order 11375 in 1967; Comprehensive Employment and Training Act of 1973, as amended in 1978; Education of the Handicapped Act, as amended by the Education for All Handicapped Children Act of 1975; Age Discrimination in Employment Act of 1967, as amended, and many others.

The effective implementation of a federal statute such as Public Law 94-482 in relation to other laws and regulations is no easy task as indicated by the results of the Management Evaluation Reviews for Compliance/Quality (MERC/Q) conducted by the U.S. Office of Education as a part of the five-year evaluation cycle mandated by Congress. Twenty-eight states have now undergone the review with an average of 81.4 percent compliance with the regulations—the highest being 97 percent and the lowest being 70.5 percent (U.S. Office of Education, April 1980).

Equity Concerns of Vocational Administrators

Major thrusts and challenges facing state-level vocational administrators through the enactment of Public Law 94-482 include greater involvement of agencies and individuals in the process of state planning for vocational education, increased emphasis on nondiscriminatory practices including emphasis on overcoming sex discrimination and sex stereotyping in vocational education programs, continuation of the sole state agency concept for the governance of vocational education, and renewed efforts in accountability and evaluation.

Equity is a visible concern of vocational educators at the local, state, and national levels. We read about equity in professional publications, we include equity in our state plans for vocational education, and the topic of equity is included in conference presentations and workshops. During the 1979 Indiana Annual

Vocational Conference, for example, Otis R. Bowen, M.D. (1979), governor of Indiana; Dr. Don K. Gentry (1979a), executive officer/state director of vocational education in Indiana and president, the National Association of State Directors of Vocational Education; and Dr. Gene Bottoms (1979), executive director of the American Vocational Association, identified some of the changes and challenges as vocational educators move from the 1970s into the 1980s. Although the speeches were presented during different conference sessions, they were in agreement on a major challenge facing vocational education—making vocational education programs equally available to all citizens.

Governor Bowen stated, "The major goal for vocational education must be to make available vocational education opportunities for all citizens of this state who desire, need and can benefit from such an education, with a special emphasis on nondiscriminatory practices such as race, religion, national origin, sex, age, handicap or veteran status. This opportunity and resultant training will produce a skilled and productive citizen—a product so much needed by business, industry and agriculture on a continual basis." Dr. Gentry asks that "we review curriculum and guidance programs for sex stereotyping and for sex bias and that we review vocational programs for accessibility to all students." Dr. Bottoms stated that "making programs equally available to all citizens will enable us to reach publics whose productive capacity is yet undeveloped. These publics include displaced homemakers, minorities, women, and adults." In order to include these as yet undeveloped publics, Dr. Gentry asked that "we improve cooperation among educational institutions and educational programs in each community so resources and programs can be shared. We need to develop programs with structural flexibility so currently employed persons can receive further training."

The above speakers are in agreement on the challenge of making vocational education programs equally available to all citizens. How do we meet this challenge?

Barriers to Equitable Job Training and Placement

Barriers to equitable job training and placement have been identified. These include (1) institutional barriers, (2) personal barriers, (3) societal barriers, and (4) programmatic barriers.

Institutional barriers are those that deprive individuals of access to and use of vocational facilities due to design, construction, and location or site of the facility. Accessibility by public transportation is important since many students cannot drive, do not drive, or have no other means of travel.

Any state using funds under its basic grant, section 120 of Public Law 94-482, to pay costs of constructing area vocational education school facilities, in accordance with its approved five-year state plan and annual program plan must meet the requirements of (a) nondiscrimination provisions in 45 CFR Part 80. This includes 45 CFR 80.3(b)(3) which provides that, in determining the site or location of the facility, a recipient may not make selections with the effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the grounds of race, color, or national origin, Subpart K—"Construction Requirements" in the General Education Provisions Regulations, 45 CFR 100b.155 through 100b.192, and (b) the Architectural Barriers Act of 1968, 42 U.S.C. 4151, pertaining to standards for design, construction, and alteration of buildings.

Meeting these requirements will assist in eliminating institutional barriers in the construction of new vocational buildings; in the acquisition, expansion, remodeling, and alteration of existing vocational buildings; and in the selection of site or location of vocational facilities.

Personal barriers to utilizing equal opportunity for job training and job placement refer to hindrances within the individual. These may be the result of social conditioning, influence of family, physical circumstances, or other causes. Self-concept of one's role in society, attitude toward job training, and attitude toward work may prevent career decisions that are realistic in terms of needs, interests, and abilities.

For example, people experiencing personal barriers to equal opportunity for job training and job placement would include women who do not see themselves as long-term workers and who do not prepare adequately for their working years even though the female labor force participation rate is close to 50 percent. This means that one of every two women in the United States is either working or looking for work (Bureau of Labor Statistics 1978). These individuals are increasing the probability that they will receive low pay, advance slowly, and have limited job opportunities.

Other examples are individuals who do not see themselves as serious candidates for company-sponsored training programs and who therefore do not make application for these opportunities, and individuals who do not see themselves as "blue-collar workers" and enter other jobs, even though they want the challenge of working with the hands as well as the mind, and want the pay, the benefits, and the career mobility of the "blue-collar job."

These are only a few of the many examples that could be cited. Personal barriers must be removed so that all individuals have the opportunity to develop fully their potential through meaningful participation in job training programs in preparation for job placement.

Societal barriers are those existing outside the individual who is seeking meaningful participation in job training and job placement. External or societal barriers are attitudes of society that the individual accepts and utilizes in making decisions concerning job training and placement. These may result from tradition; from lack of knowledge and awareness of the needs and problems of displaced homemakers, minorities, women, adults, handicapped persons, disadvantaged youths, and other publics; from sex stereotyping; or from other causes.

Examples of societal barriers to job training include cases in which individuals enroll in a job training program traditional for their sex—traditional in the sense that 75 percent or more of those enrolled are of that sex--because of the influence of others, rather than enrolling in a nontraditional program that is more suited to their needs, interests, and abilities.

Another example of societal barriers occurs when individuals do not apply for jobs nontraditional to their sex—even though those jobs are compatible with their needs, interests, and abilities—because of the disapproval expressed by others. Family members, peer groups, and significant others play an important role in eliminating societal barriers so that job training and job placement opportunities can be made available for all.

Programmatic barriers are represented by those policies, procedures, and actions of educational personnel that consciously or unconsciously limit the meaningful participation in job training programs and job placement of individuals who are in need of these services. Programmatic barriers can be found in admissions policies, recruitment practices, program prerequisites, and counseling

services. Elimination of programmatic barriers is the business of teachers, counselors, administrators, placement officers, researchers, school board members, advisory committee members, and others.

Elimination of the institutional, personal, societal, and programmatic barriers described above would do much toward creating a climate of equity. The challenge is to work collectively and cooperatively to overcome all barriers to equitable job training and job placement.

Eliminating Barriers and Creating a Climate for Equity

Available information indicates that progress has been made in providing equal access to, and meaningful participation in vocational education programs since the passage of Public Law 94-482 in 1976. We can look with pride at increased special assistance and services provided so that the handicapped and the disadvantaged, including those with limited English-speaking ability, can succeed in regular vocational programs. Nontraditional enrollments—enrollments by women in vocational education programs that have traditionally enrolled primarily men and those enrollments by men in vocational education programs that have traditionally enrolled primarily women—have increased. Adult vocational education enrollments have increased. States have selected personnel to work full-time to assist the state board in furnishing equal educational opportunities in vocational education programs to persons of both sexes, and in eliminating sex discrimination and sex stereotyping from all vocational education programs. Programs have been developed to recruit persons into vocational programs without regard to race, religion, national origin, sex, age, handicap, or veteran status. These are only a few of the many accomplishments. We cannot, however, rest on these accomplishments.

Referring once again to Public Law 94-482, section 104, the state board or the sole state agency responsible for the administration of vocational education in each state has the responsibility of providing all persons with ready access to vocational training (or retraining) that is of high quality, realistic in light of actual or anticipated opportunities for gainful employment, and suited to their needs, interests, and ability to benefit from such training. Section 104.34 of the Final Regulations for Public Law 94-482 enables the state board to carry out its functions under the state plan through a state staff and a full-time state director.

State directors of vocational education and state vocational staffs have multiple processes or techniques available to them as they strive to provide ready access to vocational training or retraining. Many of these mechanisms are included in the Act—process of state planning, emphasis on nondiscriminatory practices, sole state agency concept for governance, and renewed efforts in accountability and evaluation.

Planning

One of the major thrusts of Public Law 94-482 is greater involvement of agencies and individuals in the process of state planning for vocational education. The Act is very specific as to the planning process and the agencies, councils, and individuals to be involved in the development of vocational education plans. The state plan is crucial to achieving equal access to vocational training or retraining and job placement. Goals and objectives of vocational education, including allocation of responsibility among the various levels of education and among the various institutions of the state, and the allocation of local, state, and federal resources to meet those goals, must be included in the state plan. These goals and objectives are state board priorities.

As we approach the fourth year under Public Law 94-482, let us review the process of state planning for vocational education. Have the planning process and the greater involvement of agencies, councils, and individuals in the development of state vocational education plans resulted in an emphasis on equal access to vocational education programs?

In formulating the five-year state plan, submitted to the U.S. Commissioner of Education by July 1, 1977, for fiscal years 1978 through 1982, each state board was required to ensure the active participation of representatives of agencies, councils, and individuals as outlined in section 107 of the Act. The state board convened the representatives, as a group, at least four times during the development of the five-year state plan. The first meeting was for the purpose of planning for the development of the first draft of the state plan; the purpose of the second meeting was to consider the first draft of the state plan; the purpose of the third meeting was to consider the draft of the plan after it had been rewritten and to reflect on the results of the second meeting of the group; and the purpose of the fourth meeting was to recommend for adoption the final five-year state plan.

In formulating the five-year state plan, each state board was required to conduct a series of public hearings, after giving sufficient public notice, throughout all regions of the state. The purpose of these public hearings was to provide the opportunity for all segments of the population to give their views on the goals which ought to be adopted in the state plan, including the programs to be offered, the allocation of responsibility for programs among the various levels of education and among the various institutions of the state, and the allocation of local, state, and federal resources to meet those goals. The views expressed at the public hearings or comments submitted in writing were included in the five-year state plans with a description of how these views were reflected in the provisions of the plan; and the reasons for rejecting any view which was not accepted for inclusion in the five-year state plan.

The planning process for formulating the annual program plan and accountability report is similar to that used for the five-year state plan with two major exceptions. The state board must convene the representatives of the section 107 planning group for at least three meetings, rather than four; and one public hearing, rather than a series of public hearings, is required in formulating the annual program plan and accountability report.

The planning process and the involvement of various agencies, councils, and individuals in the development of vocational education plans in accordance with the Act does not ensure ready access to vocational training or retraining. Unless representatives of the agencies, councils, and individuals, as outlined in section 107 of the Act, have an understanding of information submitted for the plan and of the planning process, it may be difficult for them to make a valuable contribution. Inservice training may be necessary to develop increased understanding and knowledge of vocational education and of the planning process.

Information concerning public hearings—including the date, time, location, and purpose—must be made available to the public in order to provide the opportunity for all segments of the population to give their views on the goals which ought to be adopted in the state plan.

The state-level staff must have a complete understanding of the plan, must be qualified by education and experience, and must be available in sufficient numbers to fully implement the plan. The procedure for state planning for vocational education in each state must be communicated to and understood by various

agencies, councils, publics, and individuals concerned with vocational education. An understanding of the procedure for planning will result in increased and improved involvement in the planning process and stronger support for vocational education. This involvement and support will assist state boards, state directors of vocational education, and state vocational staffs as they strive for the goal of providing ready access to vocational training or retraining.

Nondiscriminatory Practices

A major thrust of Public Law 94-482 is increased emphasis on nondiscriminatory practices including emphasis on overcoming sex discrimination and sex stereotyping in vocational education programs. Any state that desires to receive funds under the Act must assign full-time personnel to assist in eliminating sex discrimination and sex stereotyping in vocational education programs and activities throughout the state. Each state must expend not less than $50,000 from funds available under its basic grant, section 120 of the Act, for this purpose.

Each state must expend funds under its basic grant each fiscal year in accordance with its approved five-year state plan and annual program plan to provide vocational education programs and placement services which are tailored to meet the needs of the following groups:

a. Persons who have been homemakers but who now, because of dissolution of marriage, must seek employment

b. Persons who are single heads of households and who lack adequate job skills

c. Persons who are currently homemakers and part-time workers but who wish to secure full-time jobs

d. Women who are now in jobs that have been traditionally considered jobs for females and who wish to seek employment in job areas that have not been traditionally considered as job areas for females

e. Men who are now in jobs that have been traditionally considered jobs for males and who wish to seek employment in job areas that have not been traditionally considered as job areas for males

Each state may use funds available under the basic grant in accordance with the approved five-year state plan and annual program plan for support services for women who enter programs designed to prepare individuals for employment in jobs that have been traditionally limited to men, including counseling as to the nature of such programs and the difficulties which may be encountered by women in such programs; job development and job follow-up services; and day care services for children of students—both male and female and including single parents—in secondary and postsecondary vocational education programs.

Subpart 3—Supportive Services and Program Improvement—funds may be used for research programs, exemplary and innovative programs, curriculum development programs, vocational education personnel training programs, and for grants to assist in overcoming sex bias and sex stereotyping in vocational education. Not less than 20 percent of the funds reserved for supportive services and program improvement are to be used for guidance and counseling services. Funds made available under the guidance and counseling program must be used to support one or more of the following activities:

a. Initiation, implementation, and improvement of vocational guidance and counseling programs and activities

b. Vocational counseling leading to greater understanding of educational and vocational options

c. Provision of job placement programs and follow-up services for vocational students and for individuals preparing for occupations requiring a baccalaureate or higher degree

d. Training designed to acquaint guidance counselors with the changing work patterns of women, with ways of effectively overcoming occupational sex stereotyping, ways of helping girls and women to select careers solely on the basis of their occupational needs and interests, and with developing improved career counseling materials which are free

e. Vocational and educational counseling for youth offenders and adults in correctional institutions

f. Vocational guidance and counseling for persons of limited English-speaking ability

g. Establishment of vocational resource centers to meet the special needs of out-of-school individuals, including individuals seeking second careers or entering the job market late in life, handicapped individuals, individuals from economically depressed communities or areas, and early retirees

h. Leadership for vocational guidance and exploration programs at the local level

Priority must be given to the use of funds available for exemplary and innovative programs for reducing sex bias and sex stereotyping in vocational education. Funds available for grants to assist in overcoming sex bias may be used to support activities that show promise of overcoming sex bias and sex stereotyping in vocational education and may be used in the areas of research, curriculum development, or guidance and counseling. All funds expended for supportive services and program improvement, section 130 of the Act, must be in accordance with the approved five-year state plan and annual program plan.

Funds available under Subpart 5—Consumer and Homemaking Education—may be used, in accordance with the approved five-year state plan and annual program plan, to support consumer and homemaking programs which encourage males and females to prepare for combined homemaking and wage earning roles, to develop curriculum materials encouraging elimination of sex stereotyping, to give greater consideration to needs in economically depressed areas, to encourage outreach programs, to prepare persons for the homemaking role, and to emphasize consumer education, nutrition, and parenthood.

Each state must expend at least 10 percent of its allotment under section 102(a) of the Act for vocational education for handicapped persons. These funds must be used to the maximum extent possible, to assist handicapped persons to participate in regular vocational education programs. Expenditure of funds for handicapped persons must be in accordance with the approved five-year state plan and annual program plan for that state.

Each state must expend at least 20 percent of its 102(a) allotment for vocational education for disadvantaged persons, for individuals with limited English-speaking ability, and for stipends for students entering or already enrolled in vocational education programs who have acute economic needs which cannot be met under other programs. The state must use, to the maximum extent possible, the funds

expended for disadvantaged persons and persons of limited English-speaking ability to enable these persons to participate in regular vocational programs. Expenditure of funds for disadvantaged persons, persons of limited English-speaking ability, and stipends must be in accordance with the five-year state plan and annual program plan.

Section 107(b)(4)(A) of the Act and 104.187(a) of the regulations require each state to set forth a detailed description of policies and procedures to ensure equal access to vocational programs by women and men. This description must include the specific actions to be taken to overcome sex discrimination and sex stereotyping in all state and local vocational education programs, and the incentives adopted to encourage enrollment of both women and men in nontraditional programs.

The issue of equal access for minorities is not specifically addressed in Public Law 94-482. Federal financial assistance under the Act, however, is subject to the regulations in 45 CFR Part 80 which effectuate the provisions of Title VI of the Civil Rights Act of 1964. These civil rights requirements are referenced in 45 CFR 100b.252 of the General Education Provisions Regulations and have a direct application to the vocational education regulations.

Federal financial assistance under the Act is also subject to the regulations in 45 CFR Part 84 which effectuate section 504 of the Rehabilitation Act of 1973, and to the regulations in 45 CFR Part 86 which effectuate the provisions of Title IX. Title IX provides that no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.

The above are only a few examples indicating that Public Law 94-482 places increased emphasis on nondiscriminatory practices including emphasis on overcoming sex discrimination and sex stereotyping in vocational education programs. One common statement concerning the use of funds—in accordance with the five-year state plan and annual program plan—appears throughout the Act and the regulations. The state plan is crucial to achieving equal access to vocational training or retraining and job placement. Goals and objectives of vocational education must be included in the state plan. These goals and objectives are state board priorities.

Governance

Public Law 94-482 mandates continuation of the sole state agency concept for the governance of vocational education. Each state desiring to participate in programs authorized by the Act must, consistent with state law, designate or establish a state board or agency which shall be the sole state agency responsible for the administration, or for the supervision of the administration, of such programs. The Act is specific as to those responsibilities the state board must perform and those that may be delegated to one or more appropriate agencies.

The Act places great responsibility on the state board for administration and leadership. The state board must have a state vocational staff sufficiently qualified and in sufficient number to administer properly the state's program of vocational education. The state vocational staff enables the state board to carry out its functions under the state plan.

The state board is solely accountable for the state's expenditure of federal vocational education funds, even though it may delegate responsibilities for administration, operation, or supervision of vocational education programs to other appropriate agencies in accordance with the Act.

The vocational education administrative structure differs from state to state. State board organization and staffing vary greatly throughout the nation. An understanding of the state's vocational education administrative and functional structure will assist representatives of agencies, councils, publics, and individuals concerned with vocational education in working collectively to meet common goals including that of providing equal access to vocational education programs.

Accountability and Evaluation

A major thrust of Public Law 94-482 is renewed efforts in accountability and evaluation. The state board must evaluate the effectiveness of each program or project supported under the Act--by federal, state, and local funds—within a five-year period in accordance with Public Law 94-482. The state evaluations are to be used to assist local education agencies, postsecondary institutions, and other recipients of funds in operating the best possible programs in vocational education, and to improve the state's programs of vocational education.

The results of the evaluation must be used as a basis to revise and improve the programs conducted under the approved five-year state plan. The state's evaluation system can be a positive approach to program improvement including additional services to women, members of minority groups, handicapped persons, disadvantaged persons, and persons of limited English-speaking ability.

The annual accountability report must show the extent to which the state, during the fiscal year preceding the submission of the report, has achieved the goals of the approved state plan. The accountability report must contain a summary of the evaluation conducted by the state in accordance with the Act and a description of how the evaluation information has been used to improve the state's program of vocational education.

Once again, the state plan for vocational education is crucial to achieving goals and objectives of vocational education. Goals and objectives in the plan are state board priorities. Programs and projects included in the plan are evaluated as a part of the state evaluation system. State evaluations are used to assist in operating the best possible programs of vocational education and to improve the state's programs of vocational education.

Strategies and Solutions

Equal educational opportunity and job placement are everyone's responsibility. The strong emphasis that Congress placed on nondiscriminatory practices including overcoming sex discrimination and sex stereotyping, through Public Law 94-482, gives vocational education a leadership position in the priority area of equity.

Commitment to equal opportunity must be unmistakably clear at the top level of administration if vocational educators are to meet the challenge given by Congress. Positive action must continue at the state level, in the local education agencies, and in postsecondary institutions so that equal access to and meaningful participation in all vocational education programs is ensured.

What can be done by the state director of vocational education, the deputy state director of vocational education, and the state vocational staff? The answers are limitless; budgetary and personnel resources are more severely constrained.

A plan of action that is used to ensure equal access to and meaningful participation in vocational education programs in one state will not work in all states. All state directors do not perform the same administrative functions. The location of authority and the level of performance of administrative functions vary from state to state. The governance structure for administering vocational education at the state level has great influence on the state board membership, the position of the executive officer, the selection of the state director of vocational education, the number of meetings of the state board, and the amount of time devoted solely to vocational education matters in the state. The organization of the state board of vocational education and the staffing of the board vary greatly throughout the nation.

A Separate State Board

Indiana is one of nine states that govern vocational education by a separate state board of vocational and technical education. A separate state board with the authority and responsibility for the administration of vocational education at all levels of vocational education—secondary, postsecondary, and adult levels—allows for efficient and effective coordination of programs and activities on a statewide basis. A separate board allows for establishment of statewide priorities, such as equal access to and meaningful participation in vocational education programs at all levels of instruction and eliminates unnecessary duplication of resources. Coordination of the statewide program of vocational education in order to eliminate duplication is a high priority as vocational funding becomes scarce and state vocational staff members become fewer, as is happening in many states.

The present governance structure in Indiana brings together, in the state board of vocational and technical education, the major providers and users of the vocational education product as outlined in Indiana Acts of 1975, Public Law 227. The membership includes secondary and postsecondary vocational educators, state level administrators, and representatives of business, labor, and agriculture. This structure provides a forum for discussing, negotiating, and deciding on the issues that affect vocational education. The governor appoints the members of the board by specified category for four-year staggered terms. The board employs an executive officer and designates a state director of vocational education and staff as it deems necessary to perform the duties imposed by law. The state director, as

the head of a separate state agency, has direct communication and an ongoing working relationship with the governor, lieutenant governor, members of the state legislature, other government officials, and heads of state agencies. The state board meets the first Tuesday of each month unless otherwise determined by the board, and the entire board agenda consists solely of vocational education matters. The separate state board has proven efficient and effective in responding to state and national thrusts and challenges in Indiana.

State board members, state advisory council members, and state directors of vocational education in other states have requested copies of Indiana's legislation that created a separate state board for use in evaluating their own vocational education governance structures. Copies of the legislation are available upon request. Change is not easy to effect. One must decide whether more good comes from working within the existing governance structure to effect change, or from working within the existing structure, under the direction of the state board, to effect change while also attempting to change the governance structure. A change in governance may require a change in state law.

Organization of the state board staff is critical to meeting the goal of providing equal access to and meaningful participation in vocational education programs. For example, the placement in the governance structure of full-time personnel to eliminate sex discrimination and sex stereotyping can have a major impact on vocational education. A sex equity coordinator located in a state agency that is primarily responsible for elementary and secondary education may have an entirely different impact on vocational education programs than if assigned to a state agency with the sole responsibility for vocational education programs at all levels of instruction.

Planning

The state plan is crucial to achieving equal educational opportunities in vocational education programs, and the state director is the key to implementing the state planning process. Once goals and objectives have been established in the state plan, the state director is the key to efficient and effective implementation of the plan. A state staff that is sufficiently qualified and in sufficient number is needed to assist the state board in carrying out its functions under the state plan. A state vocational staff committed to equal access to and meaningful participation in all vocational education programs is essential.

A plan for planning must be developed and communicated to representatives of the agencies, councils, publics, and individuals concerned with vocational education. A procedure for state planning under Public Law 94-482 and in accordance with state law has been adopted by the Indiana State Board. This procedure is communicated through the state plan, the state board newsletter—*The Vocational Coordinator*—inservice workshops, public meetings, and individual conferences. I suggest that the following be performed by the state director or a state vocational staff member as assigned by the state director:

- Ensure that the procedure used for state planning is in accordance with the Act, is realistic, meaningful, and is presented in a form that can be easily communicated to the public.

- Communicate the procedure for state planning for vocational education to various agencies, councils, publics, and individuals concerned with vocational education.

- Ensure that representatives of the agencies, councils, and individuals, as outlined in section 107 of the Act, have an understanding of the Act, the regulations, and the information submitted for input to the plan. Inservice training may be necessary to develop increased understanding and knowledge of vocational education and the planning process.

- Make available complete information concerning public hearings on state planning in order to provide the opportunity for all segments of the population to give their views on the goals which ought to be in the state plan.

- Use the requirements for state planning, as outlined in the Act, as a minimum for input from others rather than as a maximum.

- Provide inservice on the contents of the plan for state vocational staff, for vocational administrators in local education agencies, and for staff in postsecondary institutions. Participation of top level administrators indicates a commitment to goals and objectives included in the plan.

A strong commitment to equal opportunity, strong leadership at the top level of administration, and a sound state planning process based upon (a) input from

others interested in vocational education, and (b) the results of the state evaluation system will do much toward achieving equal educational opportunity in vocational education.

Positive Approach to Evaluation

The state board must evaluate the effectiveness of each program or project supported under the Act—by federal, state, and local funds—within a five-year period in accordance with Public Law 94-482. The results of these evaluations are to be used to revise and improve the state's programs of vocational education.

The approach to evaluation varies from state to state: The Indiana State Board has adopted and evaluation system that is a positive approach for program improvement and not a punitive system. Each evaluation is conducted by a team made up of members from industry, business, agriculture, labor, and vocational education. The state director and state vocational staff have the challenge of implementing the evaluation system using a positive approach. Using the state evaluation system as a positive approach to program improvement, including additional services to women, members of minority groups, handicapped persons, disadvantaged persons, and persons of limited English-speaking ability, has proven successful in Indiana.

Linkages

Vocational administrators should utilize the input of various agencies; representatives of business, commerce, industry, agriculture, and labor; and individuals in the process of achieving equal access to, and meaningful participation in vocational education programs. This can be achieved through the representatives of the section 107 (Public Law 94-482) planning group, public hearings and meetings, advisory councils and committees at the national, state, and local levels, meetings with individuals, and other communication techniques as appropriate.

Indiana's vocational delivery system consists of a partnership among government, business, commerce, industry, agriculture, and labor to provide the resources necessary for the delivery of programs and services to all students who

desire and can benefit from such education and training. The state board staff works with more than fifty agencies, councils, commissions, and organizations in planning, coordinating, and administering the state's vocational program.

Each local education agency and postsecondary institution receiving assistance under Indiana's state plan to operate vocational programs utilizes a local advisory committee to provide advice on current job needs or to evaluate the relevance of courses being offered by the agency or institution in meeting such needs. This information is used in consultation for the development of the annual application (annual program plan). The local advisory committee is composed of members of the general public, including representatives of business, industry, and labor, with an appropriate representation of both sexes and racial and ethnic minorities found in the community or region which the local advisory committee serves. In addition, advisory committees are established for each program area, and where appropriate, for each program of vocational instruction within the local education agency or postsecondary institution. Local advisory committees and program advisory committees are a valuable resource in achieving equal access to and meaningful participation in all vocational education programs.

Linkages with others may be strengthened by use of the following techniques:

- Listen to, and work with representatives of other agencies, councils, and groups concerned with vocational education throughout the year, because combined efforts and strong support may result.

- Assist representatives of agencies, councils, publics, and individuals concerned with vocational education in understanding the state's vocational education administrative and functional structure in an effort to improve working relationships.

- Build partnerships between vocational education programs and the rest of society.

Let us aspire to excellence as we work collectively toward common goals.

Equal Employment Opportunity and Personnel Procedures

Commitment to equal employment practices and personnel procedures must be clear at the state board level and at the top administrative level. Such a commitment can be shown by the board in establishing its affirmative action policy. In making all administrative decisions regarding recruitment, hiring, promotions, and conditions of employment, a strong commitment can be shown by the state director and deputy director of vocational education through positive support of equal employment practices and personnel procedures. One of the most important affirmative action steps is an adequate search for candidates that has been conducted in a nondiscriminatory manner.

An essential to achieving equal access to and meaningful participation in vocational education programs is having the right personnel in the right jobs and then giving them the authority to function.

Combined Efforts

State directors, deputy state directors and state vocational staffs must assist the state board in many ways in its great responsibility for administration and leadership. The above ideas will help in placing emphasis on equal access to and meaningful participation in all vocational education programs through total commitment at the board level and the state vocational staff level, and with the support of others concerned with vocational education.

Without the commitment of the state board and the state director, progress toward achieving equal educational opportunity in vocational education will be slow. With the strong commitment of the board, the state director, and state vocational staff, with a sound state planning process and a state plan reflecting that process, and with the support of others concerned with vocational education, great progress can be made as we work collectively toward common goals.

Others Involved in Vocational Education

What can be done by others involved in vocational education? Equal educational opportunity can be greatly facilitated by top level vocational

administrators in the local education agencies and postsecondary institutions if administrators understand state and federal laws and regulations affecting vocational education, the state plan, and the state planning process. An understanding of the state plan will assist in establishing priorities in applying for funds and services available through the state plan in accordance with local needs.

Local vocational administrators can improve their understanding of the state plan through active participation in inservice programs for that purpose. An understanding of the state's vocational education administrative and functional structure is also necessary to establish quality working relationships with the state vocational staff.

Results of the state evaluation system can be used by local administrators as a positive approach to program improvement including additional services to women, members of minority groups, handicapped persons, disadvantaged persons, and persons of limited English-speaking ability.

Local vocational administrators should actively support equal employment practices and personnel procedures in making all decisions regarding recruitment, hiring, promotions, and conditions of employment. One of the most important affirmative action steps is an adequate search for candidates that has been conducted in a nondiscriminatory manner. Local vocational administrators should, in essence, build partnerships between their vocational programs and business and industry in an attempt to work collectively toward achieving common goals.

Vocational personnel must attend public hearings, held as a part of the state planning process, and give their views on the goals which ought to be adopted in the state plan. They should follow-up on the input provided to determine how their views were reflected in the provisions of the state plan and the reasons for rejecting any view which was not accepted for inclusion in the plan.

It is important to keep in mind that it is possible under Public Law 94-482 to use available budget and personnel for the purpose of eliminating barriers to equitable job training and placement. Vocational administrators must not lose sight of the ultimate goal of providing equal educational opportunity in vocational programs which are of high quality. A proper balance must be maintained.

The state planning process can work with a strong commitment from vocational administrators at the state level, in vocational education agencies, and in postsecondary institutions. The state planning system will not work without the strong commitment and active involvement of those at the state and the institutional levels.

The above strategies alone will not result in equal educational opportunities in vocational education programs. Simultaneous efforts directed toward the issue will result in greater progress. Vocational administrators are often encouraged to do too much, and the end result makes it appear that we have achieved too little. Perhaps we can best achieve the goal of equal access and equal educational opportunities in vocational education by using those processes and techniques presently available rather than searching for new and different approaches.

Research and Policy Recommendations

Recommendations that will contribute to a plan of action for achieving equal access and equal educational opportunity in vocational education follow.

Recommendation: Locate and document positive strategies resulting in equal educational opportunities in vocational education programs. Make these strategies available to vocational administrators.

Recommendation: A study has been completed that documents the governance structure and administrative organization of the vocational education system in each state. The study was concerned with the governance structure types used by the fifty states to comply with the federal mandate of a sole state agency responsible for the administration of vocational education at the state level. The study did not deal with the quality of service of the various governance structures. Research should be conducted to determine the quality of service resulting from the various structures (Gentry 1979b). Results of this research should be made available to each state.

Recommendation: Available information indicates that all people do not utilize vocational education opportunities available to them even though the educational opportunities are compatible with their needs, interests, and

abilities. Research should be conducted to determine what does and does not increase utilization of equal opportunity for vocational education and job placement. Results of this research should be made available to vocational administrators for use in determining future strategies.

Summary

Many strategies resulting in equal educational opportunities in vocational education have been implemented in response to government regulations and laws. The principles of equal opportunity on which the laws are based have been readily accepted by most vocational administrators. As present inequities are identified and remedied, and as a state of equality is achieved for the future, the needed for laws and regulations focusing on special populations will cease to exist.

As we continue to strive for the goals of equal access and equal educational opportunity in vocational education programs, we must keep in sight the fact that the vocational system is only one of many factors influencing the student or potential student. Personal and societal attitudes are also involved. Change is not easy to effect, and progress may appear to be slow.

All vocational personnel—federal, state, and local—can assist in achieving equal access and equal educational opportunities by using a variety of processes and techniques available to them. Simultaneous efforts toward resolving the issue will result in greater progress.

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ACKNOWLEDGMENTS

Before vocational educators can adequately meet the special needs of special groups, they must be committed to a philosophy of equitable education. The issue of equity in education has received a great deal of attention over the last ten years from the legislative, judicial, and academic sectors. As a result of this attention, research and analysis have shown that the term "equity" has a different connotation for nearly everyone who has attempted to define and apply it to educational programs. In addition, a host of related terms such as equality, disparity, and discrimination are a part of the vocational educator's daily vocabulary.

In an attempt to help vocational educators to articulate a definition of equity, the National Center for Research in Vocational Education has commissioned seventeen papers on equity from three broad perspectives--academic, vocational, and special needs. The authors in each of the three groups provide their own perceptions of and experiences with equity in education to bring vocational educators to a better understanding of this complex but timely issue.

The National Center is indebted to these seventeen authors for their contribution to furthering research on equity in vocational education.

We are also indebted to Dr. Judith Gappa, Associate Provost for Faculty Affairs at San Francisco State University for reviewing and synthesizing all seventeen papers. Special thanks also go to Cindy Silvani-Lacey, program associate, for coordinating the papers and to Regina Castle and Beverly Haynes who spent many hours typing manuscripts.

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